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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

MAR 06 2017 *AB*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

ANTOINE WOODS

Plaintiff(s),

vs.

CITY COLLEGES OF CHICAGO-OLIVE HARVEY

JEWEL YOUNGE

Defendant(s).

1:17-cv-1774

Judge Robert W. Gettleman
Magistrate Judge Jeffrey T. Gilbert

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is ANTOINE A. WOODS SR.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, JEWEL YOUNGE, is
(name, badge number if known)
- ☐ an officer or official employed by CITY COLLEGES OF CHICAGO;
(department or agency of government)
OLIVE-HARVEY COLLEGE or
- ☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is CITY OF CHICAGO. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.
6. On or about MARCH 7th 2015, at approximately 2-3 ☐ a.m. ☒ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of _____
CHICAGO, in the County of COOK,
State of Illinois, at 10001 S. WOODLAWN AVE.,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☒ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:
VIOLATED 14th AMENDMENT DUE PROCESS RIGHTS
THROUGH BREACH OF THE CITY COLLEGES OF CHICAGO

OLIVE-HARVEY FACULTY/STUDENT GUIDELINES.

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): CITY COLLEGES OF CHICAGO
FACULTY HANDBOOK/GUIDELINES

8. Plaintiff was charged with one or more crimes, specifically:

9. (*Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other"*) The criminal proceedings

- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____
- ☐ Other: _____

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

#10 ATTACHED

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

PULLED RIGHT BICEP

STRAINED BACK

13. Plaintiff asks that the case be tried by a jury. ☐ Yes ☒ No

10. Attachment

1. While attending a Humanities 201 class at Olive-Harvey College of the City Colleges of Chicago, the instructor of the class Jewell Younge scheduled three to five class outings/field trips that were designed to substitute class hours. On two occasions leading up to the incident, I objected to the outings, citing the additional costs associated with the trips and how unorganized the outings were. The meetings with professor Younge regarding this matter were unproductive and dismissive at times.

On March 7th 2015, our class substituted an in-class session to visit the Gallery Guichard on 436 E. 47th St. in Chicago. Like previous outings, drivers with room in their cars are asked to assemble in the class to match with non-driving classmates. In spite of my reluctance to attend these outings and for the sake of the other student's experience, I participated fully. While assembled at the classroom, before leaving the school to the Gallery Guichard, one student was not accommodated due to his wheel chair disability. Professor Younge asked if I had extra room in my vehicle for this student as she had a small compact Honda or Toyota. On the way to the Gallery, I sustained a blow out of right passenger tire near the 400-500 east block of 39th St. in Chicago.

I made arrangements for the riders in my vehicle be picked up and dropped off. After the purchase and failure of fix-a-flat, I proceeded to change the tire. The tire appeared to be rusted on, so, I called for a ride, went to get my tools and returned to make another attempt. In my attempt to forcefully pull and separate the tire from the car, I felt a pull in my right bicep and also strained my back. With that attempt

failing, I got completely under the truck and managed to hammer the rim off of the car.

2. Professor Younge on multiple occasions violated my 14th amendment rights to “due process” and the protections under which the City Colleges of Chicago, Olive-Harvey College are afforded through the faculty and student handbooks, the State of Illinois and the U.S. Constitution.

The Olive-Harvey College of the City Colleges of Chicago and Professor Younge are in Breach of Contract.

City Colleges of Chicago Faculty Handbook

a. PART II pg. 23

Substituting Class is prohibited- “Alternative class meetings cannot be substituted for a scheduled meeting time...students must not be required to spend class time outside of this.” Professor Younge acknowledges in a 06/25/2015 email to the Dean of Students Robin Hicks and another her superior Mia Hardy that “Students are not required to visit with the class...can still attend the museum on their own time.”

b. PART III pg. 36 C

Field Trips- “All field trips are required to have the approval of the Department Chairperson or Dean...students must complete a release form prior to the trip. The trip should begin at the site of the activity...time convenient for the student...free of participation fees, from admission charges...and not mandated if trip is scheduled outside of the official scheduled time.”

Professor Younge acted recklessly, failing to adhere to 9 of the requirements of the school policies regarding class outings. In a 06/25/2015 email to the Dean of

Students and the Department Chairperson, Professor Younger specifically acknowledged that she “understood” that she violated school policies in her “informal” field trip and carpooling system and with regard to scheduling outings outside of class time.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☐ *(Place X in box if you are seeking punitive damages.)* Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: 

Plaintiff's name *(print clearly or type)*: ANTOINE WOODS

Plaintiff's mailing address: 10105 S. YALE AVE

City CHICAGO State IL. ZIP 60628

Plaintiff's telephone number: (708) 735-9939

Plaintiff's email address *(if you prefer to be contacted by email)*: _____

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.

The process of responding to an *Emergency Call for Substitution* will be structured identically to a *Timely Call for Substitution* described above. However, the process must be expedited depending on the window of time after the identification of the need for a substitute and the beginning time of the scheduled class needing substitution.

Faculty Cancelling Class

Faculty **cannot self-initiate a class cancellation**. Faculty must follow the *Substitution Policy and Call-in Procedures* in order to find a faculty member to facilitate active student learning. If neither the department chair nor secretary are available, nor security is contacted to cancel the class, faculty are required to follow up with the chair and department secretary.

Please review policy on Substitution on page 45 of the Academic Policy Manual at http://www.ccc.edu/departments/Documents/Academic%20Policy%20Manual/Academic_Policy_Manual_20140814.pdf or per the union contracts.

Substituting Class Time Prohibited

Alternative class meeting times cannot be substituted for a scheduled meeting time. When students enroll for a course they are registering for specific days and times and must not be required to attend class time outside of this.

(Insert policy here)

Payment for Classes with Excess Enrollment

Please see **page 51** of the Academic Policy Manual for information regarding Excess Enrollment: http://www.ccc.edu/departments/Documents/Academic%20Policy%20Manual/Academic_Policy_Manual_20140814.pdf

Safety and Security

Truman College makes every effort to ensure a safe and secure environment for students, faculty and staff. Please visit the Safety and Security website for more information: <http://www.ccc.edu/colleges/truman/departments/Pages/Safety-Security.aspx>

Emergency Procedures

In a life-threatening emergency: CALL 911 FIRST!

Visit the Safety and Security webpage for more detailed and up-to-date information:

New adjuncts will receive evaluations from the chair or designee within their department, an administrator and students. Returning adjuncts will also receive evaluations from students each semester and may also be evaluated by the department chair/designee and/or administrator. Your Department Chair will notify you of the evaluation dates, and evaluation forms will be provided to your students by the Office of Instruction. Copies of your evaluations will be provided upon request if not provided to you after the conclusion of the semester. A copy of the Adjunct Evaluation Form can be found in the appendix of this handbook.

Room Assignments

Changes in classrooms must not be made without prior approval from the appropriate dean and the room coordinator. Because class times and start dates vary, a classroom may appear to be available when in reality there is a class or event scheduled for that space. Do not assume that a room is open because a class is not in it!

If you would like to make a change to your classroom, please identify what room you would like to change to by logging on to the Truman Intranet <http://trinternalapps.com/fands/index.php> and clicking on the Rooms link and then the eLUCIA Rooms Reservations link. Once here, you can search for available rooms. Please contact your Chair or department assistance to reach out to the rooms coordinator in order to approve and update the room change.

Field Trips

The college recognizes that in some classes field trips enhance learning. All field trips for credit courses require advance approval of the appropriate department chairperson or dean. Field trips should be planned a minimum of three weeks in advance, and students must complete a release form prior to the trip (see the Appendix for the sample form). The trip should begin and end at the site of the activity, if possible, and students should make their own travel arrangements. Safety should be emphasized at all times during field trips, in going to and from the facility as well as while touring the facility.

In order to maximize the educational benefit of field trips, they should be:

- Directly related to course objectives and learning outcomes.
- Planned and scheduled well in advance to ensure that all students will be informed of the trip.
- Scheduled at a time convenient to students.
- Free of participation fees, admission charges, or travel charges for a field trip which requires participation by all students in a course unless such charges are collected as a course fee at registration or all students agree in advance.
- Not mandated if the trip is scheduled outside of the official scheduled class time.

Please find a copy of the Release Form in the appendix of this handbook.

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Hyde Park Art Center/MCA Chicago/House on 42nd

★ [pimphand down](#) <bglijune@gmail.com>

To: Lorraine Gary <jyounge@ccc.edu>

Fri, Apr 17, 2015 at 11:00 PM

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I explained a few classes ago that I missed the house visit due to a blow out of one of my truck tires down the street from the house. I didn't bother risking another \$250 to go back.

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To: Lorraine Gary <jyounge@ccc.edu>

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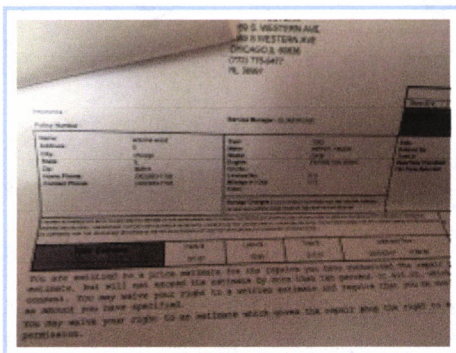
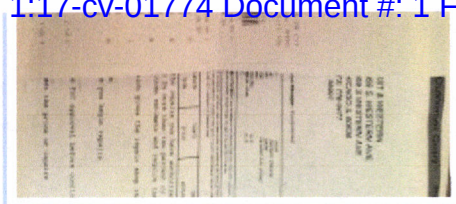
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EX. 3



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★ [Jewel Young](#)

Sun, Apr 19, 2015 at 8:40 AM

★ [June](#) <bgliljune@gmail.com>

Sun, Apr 19, 2015 at 3:48 PM

To: Jewel Young <jyoung@ccc.edu>

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This is Antoine Woods. Couldn't add attachment to the art paper that I emailed. I used the receipts from the tire blowout as an "artistic" representation of the cost & time of humanity spent getting it fixed. Seeing that I spent an entire Saturday evening & \$300 replacing a tire on 39th & Michigan for a 30 min field trip, the receipts will serve as good humanities paper.

Sent from my iPhone

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To: Jewel Young <jyoung@ccc.edu>

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To: Kevin Small <ksmall@ccmsi.com>

Thu, Aug 20, 2015 at 9:35 AM

Fri, Aug 21, 2015 at 9:19 AM

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Good morning Mr. Small,

Here are copies of the damage repair costs and an itemized list of the hospital bill report. I had to reach out to the radiologist & the doctors office for a copy of their respective bill, due to each having independent billing offices. More to follow. Thanks.

[- Show quoted text -](#)4 attachments — [Scan and download all attachments](#) **Receipt-Pep Boys Sat Mar 07 2015 \$213.pdf**
435K [View as HTML](#) [Scan and download](#) **Receipt-Pep Boys Sat Mar 07 2015 \$213_1.pdf**
270K [View as HTML](#) [Scan and download](#) **Receipt-Pep Boys Sat Mar 07 2015 \$10.pdf**
812K [View as HTML](#) [Scan and download](#) **Document-itemized hospital bill Metro South Medical Center.pdf**
674K [View as HTML](#) [Scan and download](#)**Quick Reply**

To: Kevin Small <ksmall@ccmsi.com>

EX. 5

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steve varzino

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Claim No. 15284E866012, DOL 3/7/15 [Inbox](#)★ [Kevin Small](#) <ksmall@ccmsi.com>

Tue, Aug 11, 2015 at 2:46 PM

To: "bgliljune@gmail.com" <bgliljune@gmail.com>

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Hi Mr. Woods,

CCMSI is the designated third party administrator for City Colleges of Chicago. We're looking into your claim for injury related to a class field trip for your Humanities 201 class of Olive-Harvey College, which took place on the above-date.

Thank you for speaking with me today. At your earliest convenience, please provide me a list of your medical providers, so I can order your medical records/bills. In addition, if you have any outstanding medical bills/invoices, please forward copies of them to me. If you have any other information you would like for us to consider, please forward those as well. Please contact me with any questions. Thank you.

Kevin W. Small, J.D.

Claims Representative

CCMSI

910 W. Van Buren Street, #406

Chicago, IL 60607

T: [312-455-6482](tel:312-455-6482)F: [312-455-1659](tel:312-455-1659)ksmall@ccmsi.com

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EX. 6

EX: 7
Mr. Woods,

Please call me regarding this matter when you have a moment.

Thanks

Steve

Steven Varzino | CCMSI | Claim Manager

114 South Racine Avenue, 2nd Floor

Chicago, IL 60607

[312-455-5124](tel:3124555124) phone

[217-477-6392](tel:2174776392) fax

svarzino@ccmsi.com

www.ccmsi.com

From: bgliljune@gmail.com [mailto:bgliljune@gmail.com]

Sent: Friday, February 10, 2017 12:54 PM

To: Steve Varzino <svarzino@ccmsi.com>

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Ex. 8
We regret that we are unable to provide you with a more favorable response. Should you have any questions or wish to discuss this claim in further detail, please feel free to contact me at your convenience.

Sincerely,

Steven M. Varzino

Account Manager

312-455-5124

From: Mr PHD [<mailto:bgliljune@gmail.com>]
Sent: Tuesday, February 07, 2017 2:09 PM
To: Kevin Small <ksmall@ccmsi.com>
Subject: Re: Claim No. 15284E866012, DOL 3/7/15

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☆ bgliljune@gmail.com <bgliljune@gmail.com>

Wed, Feb 8, 2017 at 1:46 PM

To: Steve Varzino <svarzino@ccmsi.com>

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Good afternoon Steve,

I have not received the letter that you have mentioned. Please email me a copy of it or mail it to my address on file (10105 s. Yale Ave Chicago, Illinois 60628) & I will address it.

Thanks,

A. Woods

Sent from my MetroPCS 4G LTE Android device

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]

Sent: Tuesday, February 07, 2017 2:09 PM

To: Kevin Small <ksmall@ccmsi.com<mailto:ksmall@ccmsi.com>>

Subject: Re: Claim No. 15284E866012, DOL 3/7/15

Good Afternoon Kevin,

I have not been able to access this email account until very recently. Additionally, I was under the impression that the correspondence between us was through another email account. In the interest of moving this claim forward, the hospital that I was treated at was Metro South Hospital 12935 Gregory St. Blue Island, IL. (708) 597-2000. You can email me a copy of the release form for my authorization of release.

Thanks,

A. Woods

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★ bglilijune@gmail.com <bglilijune@gmail.com>

To: Steve Varzino <svarzino@ccmsi.com>

Fri, Feb 10, 2017 at 12:53 PM

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Hey Steve,

Per our conversation, this is a follow up to my request for a copy of the original letter dated September 2015 denying my injury claim ending in 6012.

What is needed for my review is the cause under which this claim was denied. The Illinois Claims Practice Act requires that the denial of claims provide reasonable and accurate explanation of the basis in the policy for such a denial.

Additionally, Article VIII (8.37) of the City Colleges of Chicago Student and Academic Guidelines outlines the coverage under which students are protected.

Sincerely,

Antoine Woods

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★ **Steve Varzino** <svarzino@ccmsi.com>

To: "bglilijune@gmail.com" <bglilijune@gmail.com>

Mon, Feb 13, 2017 at 2:19 PM

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EX: 10 ..

☆ **Mr PHD**<bgliljune@gmail.com>

Tue, Feb 7, 2017 at 2:08 PM

To: Kevin Small <ksmall@ccmsi.com>

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Good Afternoon Kevin,

I have not been able to access this email account until very recently. Additionally, I was under the impression that the correspondence between us was through another email account. In the interest of moving this claim forward, the hospital that I was treated at was Metro South Hospital 12935 Gregory St. Blue Island, IL. [\(708\) 597-2000](tel:7085972000). You can email me a copy of the release form for my authorization of release.

Thanks,

A. Woods

☆ **Steve Varzino**<svarzino@ccmsi.com>

Wed, Feb 8, 2017 at 11:36 AM

To: "bgliljune@gmail.com" <bgliljune@gmail.com>

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Mr. Woods,

Kevin has forwarded your email to me as he is now working on other accounts at our office.

With respect to this claim, please be advised we issued the following letter of denial on 09/25/2015.

September 25, 2015

Antoine Woods

10105 South Yale Avenue

Chicago, IL 60628

Insured: City Colleges of Chicago

Claimant: Antoine Woods

Date of Loss: 03/07/2015

Our File No.: 15284E866012

Dear Mr. Woods,

As you are aware, CCMSI is the designated third party claims administrator for the City Colleges of Chicago. We have completed our investigation into this matter and find that City Colleges has no legal obligation to make any payment on your claim.

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To: "jyoung@ccc.edu" <jyoung@ccc.edu>

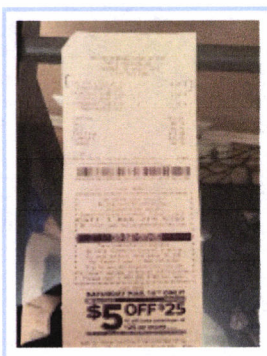
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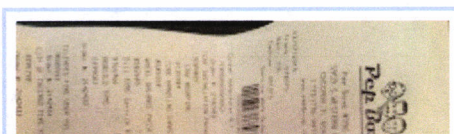
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Art Visit

[★ Jewel Young](#) <jyoung@ccc.edu>[Thu, Jun 25, 2015 at 6:47 PM](#)

To: Robin Hicks <ricks7@ccc.edu>, Mia Hardy <mhardy13@ccc.edu>

Cc: pimphand down <bgliljune@gmail.com>

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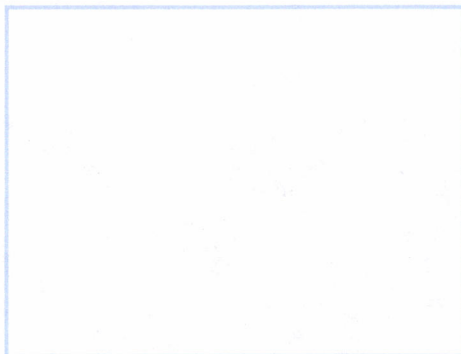
Good Evening, All:

I have reviewed Mr. Woods' paper; it is not Mr. Woods' best work. My offer for a make up grade, as described in the previously forwarded academic contract, still stands.

Please find attached a photograph of Mr. Williams' class at Gallery Guichard, last semester, with artists and gallery owners, Mr. and Mrs. Guichard. Two of the students in the picture rode in the car with me. I understand that it is against school policy for instructors to carpool students to events. Most students, as is evident from the photograph, find their own route. However, for the past two semesters, I have been operating an informal carpool. Slots in the carpool are reserved in advance, during class. Students who did not sign up for the carpool and, for whatever reason, did not secure their own transportation, may ride with me if additional space is available. Students are not obligated to visit with the class, so long as they visit the exhibit listed on the syllabus; therefore, students who neither secured transportation, nor reserved a spot in the carpool, can still attend the museum on their own time.

I have discontinued the practice of organizing informal carpools, as of this summer. This summer Humanities 201 class visited Hyde Park Art Center, last week. All students secured their own transportation to the museum. Nine of 12 enrolled students attended. (Two of the 3 students not in attendance were excused.)

Sincerely,
Jewel Sophia Young



Younge-Hum201Spring2015-with-Gallery-Guichard.jpg
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Ex. 12

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

Plaintiff ANTOINE WOODS

v.

Defendant CITY COLLEGES OF CHICAGO

OLIVE HARVEY COLLEGE

Case Number:

Judge:

NOTICE OF MOTION

TO: JEWEL YOUNGE

226 W. JACKSON BLVD STE 103

CHICAGO, IL. 60606

PLEASE TAKE NOTICE that on _____ at _____, or as soon thereafter as I may be heard, I shall appear before the Honorable Judge _____ or any judge sitting in his or her stead in Courtroom _____ of the U.S. District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn St., Chicago, Illinois and shall present the following motion attached hereto:

CERTIFICATE OF SERVICE

I hereby certify that on _____, I provided service to the person or persons listed above by the following means: _____

Signature: _____

Date: _____

Name (Print): _____

Address: _____

Phone: _____

